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5 Attorneys for Defendants 1850 BRYANT LAND
6 LLC, CHRISTOPHER PAUL FOLEY AND
DOUGLAS ROSS

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

10
11 UNITED STATES OF AMERICA, *ex rel.*
LEIASA BECKHAM, and STATE OF
12 CALIFORNIA, *ex rel.* LEIASA BECKHAM,

13 Plaintiff,

14 vs.

15 1850 BRYANT LAND LLC, KASLOFSKY
& ASSOCIATES LLC, THURSTON
16 KASLOFSKY, CHRISTOPHER PAUL
FOLEY, DOUGLAS ROSS, SAN
17 FRANCISCO COMMUNITY INVESTMENT
FUND, CITY AND COUNTY OF SAN
18 FRANCISCO, and NAOMI KELLY,

19 Defendant.

Case No. 3:21-cv-05742-RS

Declaration of Sherri Franklin

1 I, Sherri Franklin, declare as follows:

2 1. I am the Chief Executive Officer at Muttville. I have been in this role since
3 January 1, 2007. I have personal knowledge of the facts set forth below and, if called upon to do
4 so, I could and would testify competently about those facts.

5 2. On behalf of Muttville, I was involved in the discussions with 1850 Bryant Land,
6 LLC to potentially partner in the development of a new construction community condominium
7 project located at 1850 Bryant Street, San Francisco, CA (the "1850 Bryant Project"), whereby
8 Muttville would contribute capital in effort to purchase its own condominium unit.

9 3. While Muttville and 1850 Bryant Land, LLC engaged in various discussions,
10 Muttville ultimately decided not to move forward with the 1850 Bryant Project. MNC does not
11 fault 1850 Bryant Land, LLC or its principals in connection with MNC's decision not to move
12 forward with the 1850 Bryant Project.

13 4. Muttville has never obtained grant funds or any other public money in connection
14 with the 1850 Bryant Project.

15
16 I certify under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct. Executed at San Francisco, California, on
18 10/5/2022.

19 DocuSigned by:

20 *Sherri Franklin*

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21 Sherri Franklin
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